

BILLIE LM ADDLEMAN, #6-3690

Hirst Applegate, LLP

P. O. Box 1083

Cheyenne, WY 82003-1083

Phone: (307) 632-0541

Fax: (307) 632-4999

baddleman@hirstapplegate.com

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

CUSTODIA BANK, INC.

Plaintiff,

vs.

FEDERAL RESERVE BOARD OF
GOVERNORS and FEDERAL RESERVE
BANK OF KANSAS CITY,

Defendants.

}
}
}
}
}
}
}
}
}
}

Civil No. 1:22-cv-00125-SWS

***UNOPPOSED MOTION FOR LEAVE OF COURT TO FILE
BRIEFS IN EXCESS OF TWENTY-FIVE PAGES***

Defendant, Federal Reserve Bank of Kansas City, (hereinafter “Defendant” or “FRBKC”), respectfully requests the Court enter an Order granting both Defendants leave to file briefs no longer than forty-five (45) pages. In support of this Motion, Defendant FRBKC states as follows:

1. Plaintiff filed its *Complaint* on June 7, 2022.
2. Both Defendants’ response to the *Complaint* is due August 16, 2022 [Doc. No. 30].
3. Pursuant to Rule 7.1(b)(2)(B) of the United States District Court Local Rules, briefs in support of and in opposition to all dispositive motions should not exceed 25 pages.

HIRST APPLGATE, LLP

LAW OFFICES

P.O. BOX 1083

CHEYENNE, WYOMING 82003-1083

However, the same Rule contemplates briefs in excess of twenty-five (25) pages when complex or numerous legal issues justify such relief.

4. The *Complaint* includes a variety of complex legal claims, including claims arising under the Due Process, Separation of Power and Appointments Clause allegations, as well as administrative law issues arising under the Administrative Procedure Act.

5. On August 4 and 5, 2022, Defendant FRBKC's counsel conferred with Plaintiff's counsel, Scott Ortiz, about an extension of the page limit for both Defendants to respond to the *Complaint*. Plaintiff's counsel agreed to an extension of no more than forty-five (45) pages for each Defendant to file their brief in support of a motion to dismiss.

6. For these reasons, Defendant FRBKC respectfully requests the Court grant this Motion and enter an Order granting both Defendants up to and including forty-five (45) pages for their respective brief in support of their motion to dismiss.

Dated: 8 August 2022.

HIRST APPELATE, LLP

BY: /s Billie LM Addleman
BILLIE LM ADDLEMAN, #6-3690
OF HIRST APPELATE, LLP
Attorneys for Defendant FRBKC
P. O. Box 1083
Cheyenne, WY 82003-1083
(307) 632-0541

CERTIFICATE OF SERVICE

I certify the foregoing ***UNOPPOSED MOTION FOR LEAVE OF COURT TO FILE BRIEFS IN EXCESS OF TWENTY-FIVE PAGES*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 8 August 2022, and that copies were served as follows:

John K. Villa
Ryan Scarborough
Whitney D. Hermandorfer
Jamie Wolfe
WILLIAMS & CONNOLLY
680 Maine Avenue SW
Washington, DC 20024
Attorneys for Plaintiff

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Scott E Ortiz
WILLIAMS PORTER DAY & NEVILLE
159 North Wolcott, Suite 400
P O Box 10700
Casper, WY 82602
Attorneys for Plaintiff

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Angela Tarasi
KING & SPAULDING LLP
1401 Lawrence Street
Suite 1900
Denver, CO 80202
*Attorney for Defendant Federal Reserve Bank of
Kansas City*

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

s/ Shannon M. Ward
OF HIRST APPLGATE, LLP
Attorneys for Defendant FRBKC